

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Carol M. Gaetano, individually and as  
Special Administrator of the Estate of  
Anthony Albert Gaetano,

Plaintiff,

vs.

National Union Fire Insurance Company of  
Pittsburgh, PA,

Defendant.

Case No. 4:15-cv-03361-RBH

**UNOPPOSED MOTION OF  
DEFENDANT FOR ORDER ENLARGING  
DEFENDANT'S DEADLINE TO  
RESPOND TO COMPLAINT**

Defendant National Union Fire Insurance Company of Pittsburgh, PA ("Defendant"), by and through its undersigned counsel hereby respectfully moves the Court for an order pursuant to Local Rule 6.01 for an Order to enlarge Defendant's deadline to file and serve its Answer or response to the Complaint in this action. Defendant was served through its registered agent with the state court summons and complaint on or about July 31, 2015, and Defendant timely removed the case to this Court on August 24, 2015, and pursuant to local rule 81(c)(2)(C) the Defendant's deadline to file and serve its Answer or other responsive pleading is August 31, 2015. Undersigned counsel for Defendant seeks a fifteen (15) day enlargement of the August 31 response deadline, as to make the new deadline September 15, 2015. Counsel has conferred with counsel for Plaintiff, who consents to the granting of such enlargement. The declaration of Defendant's counsel is offered in further support of this unopposed motion.

(SIGNATURE ON FOLLOWING PAGE)

Respectfully submitted,

COLLINS & LACY, P.C.

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August 27, 2015

Columbia, South Carolina